



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

May 2, 2025

**SO ORDERED**

**BY ECF**

Honorable George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MAY 05 2025**

The May 8, 2025, conference is adjourned  
to July 9, 2025 at 11:30 a.m.

*George B. Daniels*  
HON. GEORGE B. DANIELS

**Re: *United States v. Pedro Pablo Valentin et al., 25 Cr. 2 (GBD)***

Dear Judge Daniels:

The Government submits this letter with the consent of defense counsel for Pedro Pablo Valentin and Bartolome Alberto Ortiz, to respectfully request an approximately 60-day adjournment of the conference currently scheduled for May 8, 2025, in the above-captioned matter. The Government produced discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure on or about March 3, 2025 and on or about March 12, 2025. An adjournment of the May 8 conference would allow the defendants additional time to review the discovery materials and for the parties to discuss next steps in this case. The parties are available during the afternoons of July 9 to 11, 2025 and July 15 to 17, 2025. If needed, the parties can provide additional availability.

In addition, the Government respectfully requests, with the consent of the defendants, that the time between May 8, 2025, and the date of the adjourned conference, be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the ends of justice served by the granting of the proposed exclusion outweigh the best interests of the public and the defendants in a speedy trial, as the proposed exclusion will allow

[CONTINUED ON THE NEXT PAGE]

the defendants additional time to review produced discovery and the parties to discuss the possible resolution of this case, if any.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

By:   
Varun A. Gumaste  
Assistant United States Attorney  
(212) 637-1023

cc: Thomas Dunn, Esq. (by ECF)  
Harvey Fishbein, Esq. (by ECF)